

April 23, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Presentation, PS Docket Nos. 10-255 & 11-153

Dear Ms. Dortch:

On April 19, 2012, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”), Brian Josef, Assistant Vice President, Regulatory Affairs, CTIA, Matthew Gerst, Counsel, External & State Affairs, CTIA, Brian Daly (AT&T), Joe Marx (AT&T), Allison Jones (Sprint), Ray Rothermel (Sprint), Steve Zweifach (Sprint), Shellie Blakeney (T-Mobile), Harold Salters (T-Mobile), David Connor (US Cellular), Grant Spellmeyer (US Cellular), Bill Tortoriello (US Cellular), Nneka Ezenwa (Verizon), Kevin Green (Verizon), Robert Morse (Verizon), and Susan Sherwood (Verizon) met with Patrick Donovan, David Furth, Aaron Garza, Cheryl King, Zenji Nakazawa, Erika Olsen, Henning Schulzrinne, David Siehl, Jerry Stanshine, and Karen Strauss all of the Federal Communications Commission.

Consistent with its comments and reply comments in the above-captioned proceeding,¹ CTIA and its member companies expressed to the Commission a shared goal and recognition of the need to ensure that Americans, including the deaf, hard of hearing and speech impaired communities, can effectively utilize wireless handsets and services to contact publicly available emergency services. In order to meet this goal in a reasonable timeframe, CTIA and attending member company representatives discussed the potential for investigating a voluntary approach to leverage existing Short Message Service (“SMS”) technology to support emergency communications to appropriate Public Safety Answering Points (“PSAPs”). While CTIA’s member companies explore whether the use of SMS as an emergency communications service is technically, economically and operationally feasible, meeting attendees reviewed significant technical and public policy complexities that must be addressed before SMS-to-911 services can be nationally deployed.

Specifically, CTIA suggested that any voluntary approach must be standards-based to allow wireless service providers the flexibility to support SMS-to-911 consistent with each service provider’s existing and unique network architectures. CTIA noted that any expectation that a voluntary approach will incorporate proprietary technological solutions will prove unworkable in a reasonable timeframe. As an exclusive wireless service provider

¹ See Comments of CTIA-The Wireless Association®, PS Docket Nos. 10-255 & 11-153 (filed Dec. 12, 2011); Reply Comments of CTIA-The Wireless Association®, PS Docket Nos. 10-255 & 11-153 (filed Feb. 9, 2012).

offering, we discussed the complexity of adequately explaining to the public that SMS may only refer to text messaging services supported by wireless services providers and not third party text messaging service providers. In addition, meeting attendees discussed the significant technical complexities related to leveraging the existing SMS network architecture to support routing to the appropriate PSAP, serve as a reliable emergency communications service and support existing features of wireless 9-1-1 services, such as location information and roaming.

As the wireless industry is only one part of the overall 9-1-1 system, meeting attendees discussed the Commission's efforts to ensure that PSAPs will simultaneously have the technical, operational and funding capabilities to accept, process and respond to text-based emergency communications from wireless consumers. Meeting attendees also discussed the inherent challenges of adequately explaining the capabilities and limitations of SMS-to-911 services to a general public having pre-conceived expectations about wireless 9-1-1 voice services.

Finally, CTIA noted that liability protection has always been an inherent component of the 9-1-1 system. CTIA expressed concern that existing liability protections at the federal and state level are insufficient to protect the wireless industry, Public Safety community and other stakeholders that may support SMS-to-911 services.

Pursuant to Section 1.1206 of the Commission's rules,² this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please let the undersigned know if you have any questions regarding this filing.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef
Assistant Vice President, Regulatory Affairs
CTIA-The Wireless Association®

cc: Patrick Donovan
David Furth
Aaron Garza
Cheryl King
Zenji Nakazawa
Erika Olsen
Henning Schulzrinne
David Siehl
Jerry Stanshine
Karen Strauss

² 47 C.F.R. § 1.1206.